

Clean and Healthy New York – Oregon Environmental Council – Vermont Public Interest Research Group - Washington Toxics Coalition

Dr. Alex Stone
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P.O. Box 47600
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RE: Comments on Alternatives Assessment and Risk Reduction Guidance

May 3, 2013

Dear Dr. Stone:

On behalf of the undersigned organizations, we would like to thank you for the opportunity to comment on the draft Alternatives Assessment and Risk Reduction Guidance. We would like to note that it is unprecedented for the Interstate Chemicals Clearinghouse to conduct a formal public comment period for documents it produces.

We appreciate both the Washington Department of Ecology and the broader network of states in the Interstate Chemicals Clearinghouse prioritizing alternatives assessment (AA) as an integral tool for the identification of safer chemicals and processes.

We have the following overarching recommendations:

- 1) **Keep the focus on assessing chemical hazards.** We support the Guidance's assertion that hazard determinations must be made first. The fundamental focus of an Alternatives Assessment must remain on hazard identification and minimization. This is the approach that many leading businesses have used to choose safer alternatives. It is cost-effective, efficient and leads to decisions that help companies avoid substitutes that are regrettable. However, the current document returns to the concept of risk time and again – repeating the word itself 103 times. Risk Assessments are a different tool that should not be confused with Alternatives Assessment. It weakens the Alternatives Assessment approach and will dilute its effectiveness. Most important is that the minimum requirement for an Alternatives Assessment should be **a hazard assessment**. Including other criteria such as exposure, performance, availability and cost can be other things considered, but not part of the minimum requirements.
- 2) **The Guidance needs to be streamlined and clearer.** The structure of the document is confusing. As this document is intended to aid small businesses and other stakeholders who have not contemplated chemical hazards and safer alternatives, it is vital that it be accessible. We recommend the following structure:
 - a. **Introduction** [merge existing sections 3 and 4, and delete the Principles]
 - b. **Approaches to AA: Examples** [new section – see below]
 - c. **Three Core AA Steps**
 - i. Identify Chemicals of Concern [new addition – see below]
 - ii. Identify Alternatives [existing sections]
 1. Initial Evaluation Module [existing section 5a]

- 2. Identification of Alternatives Module [existing section 5b]
 - iii. Evaluate Alternatives – Assessment Modules [existing sections]
 - 1. Hazard Assessment Module [merge existing sections 6b and 20b]
 - 2. Cost and Availability Module [merge existing sections 6c and 20c]
 - 3. Performance Evaluation Module [merge existing sections 6a and 20a]
 - 4. Exposure Assessment Module [merge existing sections 6d and 20d]
 - 5. Materials Management [merge existing sections 6e and 20e]
 - 6. Social Impact Module [merge existing sections 6f and 20f]
 - 7. Life Cycle Thinking Module [merge existing sections 6g and 20g]
 - d. **Stakeholder Engagement** [merge existing sections 5d and 10b]
 - e. **AA Decision Theory Frameworks** [merge existing sections 4 (pages 26-30), 5c, and 10a]
 - f. **Resources for Existing Alternatives Assessments.**
- 3) **Delete the Principles on page 18.** They are overly prescriptive and appear to lead to time consuming and costly analyses at every life cycle stage. These proposed principles are not widely supported. Do not prescribe that all Alternative Assessments require a full life cycle assessment.
- 4) **Add section: “Approaches to Alternative Assessments: Examples”** As an AA guide it is important to reference current approaches to AA within governments, businesses, universities, and non-governmental organizations. These references can be quite short. For example, include a one paragraph overview followed by a flowchart that highlights which steps and modules are covered by each example. We recommend the IC2 include the following AA examples:
 - a. Government Approaches
 - i. European Union – REACH
 - ii. WA Department of Ecology DecaBDE alternatives assessment
 - iii. Massachusetts Toxics Use Reduction Institute: *Five Chemicals Alternatives Assessment Study*
 - iv. State of Maine
 - v. Stockholm Convention on Persistent Organic Pollutants: as specified by the POPs Review Committee
 - vi. U.S. Environmental Protection Agency Design for Environment Program

Note: listing the government examples will be helpful for businesses that must comply with these initiatives.
 - b. Other Approaches
 - i. BizNGO: *Chemicals Alternatives Assessment Protocol*
 - ii. Hewlett-Packard approach to AA
 - iii. Lowell Center for Sustainable Production: *Alternatives Assessment Framework*
 - iv. SubsPort: Steps to Substitution
 - v. UCLA: multicriteria decision analysis
- 5) **Add a section: Resources for Existing Alternatives Assessments.** The Interstate Chemicals Clearinghouse is already folding Green Screen analyses and QCATS analyses into its database on chemicals of concern to states. This and other resources for existing alternatives assessments should be made available to AA Guide users, as it

may eliminate the need for them to redo that work. This would be of significant use to small businesses, in particular.

- 6) **Add “Identify Chemicals of Concern” Step.** All the “Approaches to AA: Examples” included above start from a chemical or chemicals of concern to human health and/or the environment. We recognize that there are many approaches to identifying chemicals of concern. But there are also many routes, as the IC2 Guidance for Alternatives Assessment document notes, to evaluating and selecting safer alternatives. It is important that the starting point for alternatives assessment be as defined in the IC2 Guidance document as a chemical or chemicals of concern. It’s very important for IC2 to highlight the various criteria organizations use to identify chemicals of concern because those criteria highlight the types of adverse effects organizations prioritize as well as inform whether alternatives are safer.
- 7) **Merge existing sections 4 (pages 26-30), 5c, and 10a into a new section titled “AA Decision Theory.”** We understand the heroic work that the IC2 TAAG did to create the decision frameworks based on amalgamations of existing approaches to AA. However, it needs to be easier to understand how to use these frameworks. In the spirit of creating an AA Guide, we recommend renaming these “AA decision theory frameworks” to reflect their comprehensive and overarching nature.
- 8) **Change the Title to Accurately Reflect the Content.** Given the scope of this material, we recommend giving a broader name, such as Encyclopedia or Resource Guide. In addition, the term risk reduction is not an accurate characterization. The document is supposed to be a Resource Guide for Conducting Alternative Assessments. Suggested titles would be *Resource Guide for Alternatives Assessment*, *Guide to Alternatives Assessment*, or *Alternatives Assessment Encyclopedia*.

We sincerely hope that the completed guide will help a wide range of users engage in the Alternatives Assessment process.

Sincerely,

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